

Gustavo F. Bruckner
POMERANTZ LLP
600 Third Avenue, 20th Floor
New York, New York 10016
Phone: (212) 661-1100
Facsimile: (917)-463-1044
gfbruckner@pomlaw.com

Counsel for Lead Plaintiff Movant Yun Wang

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ALI KARIMI, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

DEUTSCHE BANK
AKTIENGESELLSCHAFT, JOHN
CRYAN, CHRISTIAN SEWING, and
JAMES VON MOLTKE,

Defendants.

Case No. 1:20-cv-08978-ES-MAH

**NOTICE OF MOTION FOR
ADMISSION *PRO HAC VICE* OF
EMMA GILMORE AND
DOLGORA DORZHIEVA**

PLEASE TAKE NOTICE that on a date determined by the Court, Counsel for Lead Plaintiff Movant Yun Wang (“Movant”), will move before the Honorable Michael A. Hammer of the United States District Court for the District of New Jersey, 50 Walnut Street, Newark, New Jersey 07101, for an order, pursuant to Local

Civil Rule 101.1(c), admitting Emma Gilmore and Dolgora Dorzhieva to appear and participate *pro hac vice* in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that Movant will rely upon the annexed Certification of Gustavo F. Bruckner and Declarations of Emma Gilmore and Dolgora Dorzhieva in support of this motion. No brief is necessary because the law in this area is well-settled.

PLEASE TAKE FURTHER NOTICE that oral argument is not requested unless the matter is contested.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Defendants have advised that they consent with regard to the relief sought in this Motion.

Dated: October 22, 2020

Respectfully submitted,

POMERANTZ LLP



Gustavo F. Bruckner
POMERANTZ LLP
600 Third Avenue, 20th Floor
New York, New York 10016
Phone: (212) 661-1100

Facsimile: (917) 463-1044
gfbruckner@pomlaw.com

*Counsel for Lead Plaintiff Movant
Yun Wang*